

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
GEORGE A. SEMIAN,	:	CHAPTER 13
a/k/a George Andrew Semian	:	
a/k/a George Semian	:	Case No. 5-23-00220 HWV
Debtor	:	

KNEPH, LLC,	:	
	:	
vs.	:	
	:	Adversary No. 5:23-ap-00025 HWV
GEORGE A. SEMIAN,	:	
a/k/a George Andrew Semian	:	
a/k/a George Semian	:	

MOTION FOR APPROVAL OF STIPULATION
for SETTLEMENT OF ADVERSARY PROCEEDING

Plaintiff, KNEPH, LLC, through its attorney, Raymond W. Ferrario, requests the Court to approve the attached Stipulation to settle this adversary proceeding.

1. After successful mediation before Attorney David J. Harris in Wilkes-Barre on November 22, 2023, the parties reached an agreement to fully settle the outstanding adversary proceeding litigation in the above matter.

2. The stipulation is intended to fully resolve the outstanding issues and close these proceedings.

3. The stipulation provides all other creditors in this case with the same distributions as a previously were to receive under the existing filed plan.

4. The stipulation proposes an amended plan which will permit the Chapter 13 Trustee to continue to monitor the plan for the benefit of all creditors, including KNEPH, LLC, and compensate the Chapter 13 Trustee at an increased amount for its efforts.

5. The Debtor's income as a realtor is variable and unpredictable based upon unpredictable factors such as his future health, his efforts, and real estate market conditions in this area.

6. The KNEPH, LLC debt is strictly related to the Debtor's business reputation and greatly effects the debtor's ability to earn future income to generate the funds for this bankruptcy plan and for the creditors benefitting under this plan. Therefore this status justifies the separate classification of KNEPH, LLC under an amended plan proposed under the stipulation.

WHEREFORE, KNEPH, LLC, with the concurrence of the Debtor, requests that this Motion and Stipulation be approved by the Court.

Respectfully submitted,

by s/Raymond W. Ferrario

Raymond W. Ferrario, Attorney for KNEPH, LLC
Suite 528, 538 Spruce Street
Scranton, PA 18503
570-963-7878; FAX: 570-963-7850
raymondwferrariopc@comcast.net